

BALIN AFFIDAVIT

EXHIBIT D

Law Offices of Bruce W. Minsky, P.C.

112 Brick Church Road
New Hempstead, NY 10977
Telephone: (646) 234-7006; (212) 956-3123
Facsimile: (702) 973-8607 (Not for Litigation Purposes)
E-mail: dovzeev@aol.com

Bruce W. Minsky, Esq.

Member of the California, Connecticut and New York Bars

February 14, 2008

Honorable Kenneth M. Karas, USDI
United States District Court, Southern District of New York
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: SwordPen.Com Inc. v. Henry Holt and Co., et al.
Case No.: 07 CIV 10955 (KMK)

Dear Judge Karas:

I am the attorney for plaintiff SwordPen.Com, Inc. ("SwordPen"). Being in receipt of the February 4, 2008 correspondence from Davis Wright Tremaine, LLP ("Defendants' Correspondence"), attorneys for the defendants Henry Holt and Co. ("Henry Holt") and Karen Katz ("Katz"), as well as ensuring compliance with paragraph II A of your honors Individual Rules of Practice, this correspondence with serve as the requisite opposition and reply. Note that the undersigned did coordinate with your honor's chambers to extend the time to respond to February 15, 2008.

For background information, and as detailed in the underlying Complaint and Demand for Jury Trial ("Complaint"), Zev Lewinson ("Lewinson"), an author of numerous children stories, created/authored a manuscript entitled *What Do You Call It?*, the manuscript having been slightly amended/modified since the U.S Copyright Office Registration, numbered TXu 928-388 and dated December 2, 1999 (the copyrighted manuscript and subsequent modifications/amendments hereinafter jointly referred to as the "Lewinson Work"). The plaintiff SwordPen, on or about August 1, 2007, became the assignee of the Lewinson Work.

At the outset, contrary to the allegations in the Defendants' Correspondence, the submission of the Lewinson Work to Henry Holt, as detailed in the Complaint, was not, by any means, 'unsolicited'. Lewinson established contact with Henry Holt and spoke with David Rohlfing ("Rohlfing"), an editor, who clearly instructed Lewinson how to submit the Lewinson Work as an 'unagented author'. Attached are instructions, from Henry Holt, that were provided to Lewinson for the submission of the Lewinson Work. A cover letter, addressed to Rohlfing, accompanied the eventual submission ("Submission"). The instructions and cover letter are attached hereto as Exhibit "A". While it may be correct to say that a publishing house does not entertain unsolicited manuscripts, the Submission herein was authorized, expected and received by Henry Holt.

Additionally, Lewinson spoke with Rohlfing on many occasions prior and subsequent to the Submission. One of the conversations, Lewinson detailed how he sought to promote a concept of 'world peace' and, on many occasions, contacted the United Nations and embassies in order to get the proper child's name and themed word in the foreign language of each country. Lewinson also explained to Rohlfing that he planned to dedicate the book to the United Nations and world peace. Interestingly enough, Katz claims the United Nations reference in the 'Katz Book' (the term as defined in the *Defendants' Correspondence*) was her publisher's idea (See e-mail exchange between Katz and Lewinson attached hereto as Exhibit "B").

Law Offices of Bruce W. Minsky, P.C.
Attorneys at Law

Honorable Kenneth M. Karas
 February 14, 2008
 Page 2

As a side note, while the Defendants' Correspondence includes the copyrighted version of the Lewinson Work, the correct version of the Submission is a slightly amended version which is attached hereto as Exhibit "C".

Four to five months after the Submission date, approximately mid-year 2000, and after numerous conversations with Rohlfing, Lewinson received a letter from Henry Holt, signed by Rohlfing, attached hereto as Exhibit "D" ("Henry Holt Letter") stating the Submission was 'not suitable for their list', the term list meaning a list of topics that the publisher is planning to publish. Additionally, the Henry Holt Letter clearly states that they had 'a chance to review the [Submission]' and gave it careful consideration. The Henry Holt Letter further states that they would be happy to return the Submission. The Submission, though, was never returned. For the Defendants' Correspondence to state that the defendants vigorously deny that they had access to the Submission is wholly inaccurate.

Of interesting note, while the Defendants' Correspondents attempts to show that there was a gap of seven years between the Submission and the publishing of the Katz Book, the truth is far different. Henry Holt, in a letter to Lewinson's then attorneys, dated October 11, 2006, states that Katz conceived the idea in the fall of 2001 (See letter attached hereto as Exhibit "E"). And, while Katz claims to have gotten ideas from Henry Holt, it is very likely that the real gap in time was a mere one year. Even more striking, since Henry Holt never sent back the Submission, the Lewinson Work was more likely readily available to Henry Holt during all relevant times related to Katz's 'conceived idea'.

It is obvious that Henry Holt had access to and reviewed the Lewinson Work. It is also obvious that Henry Holt, at the very least, provided Katz with ideas for the Katz Book. It is further obvious that Lewinson had provided Henry Holt with ideas and creative formation for the Lewinson Work, the same, having been part of the Submission.

Notwithstanding the defendants allegation, the cursory similarities, those already identified prior to any discovery inquiry, are as follows:

- (a) Both stories revolve around the concept of a child in a country that says a themed-translated word in the language of that country and has a graphic corresponding illustration relating to the county and/or its culture. In other words, _____ lives in _____ and says _____;
- (b) Out of the eleven countries/child entries in the Katz Book, 6 (approximately 55%) are exact matches of countries in the Lewinson Work (America/United States; Japan/Japan; Australia/Australia; Mexico/Mexico; China/China; and, Russia/Russia);
- (c) Cursory examples of content similarities are:
 - (i) In the Katz Book, for the China entry, a girl and a boy are sitting on the bank of a river (perhaps the famous Yangtze River) listening to their grandmother while she cuddles a baby on her lap; a river rather than the more famous landmark, the Great Wall of China. In the Lewinson Work, the China entry has a child is sailing on the Yangtze River as he listens to stories from his Grandfather;
 - (ii) In the Katz Book, for the Australian entry, a girl plays hide and seek with her friends in Australia as a boy is napping in the picture. In the Lewinson Work, a Swedish entry has a boy dreaming that he plays hide and seek with his friends;

Law Offices of Bruce W. Minsky, P.C.
Attorneys at Law

Honorable Kenneth M. Karas, USDJ
February 14, 2008
Page 3

(iii) In the Katz Book, for the Russian entry, a boy is playing in the snow. In the Lewinson Work, for the Russian entry, a boy enjoys playing in the snow;

(iv) In the Katz Book, the Japan entry has children riding bikes. In the Lewinson Work, the Japan entry has the child riding her tricycle.

(d) In the Katz Book, in the penultimate page, the author asks the children "Can You Say Peace?" and illustrates kid faces from all over the world. In the Lewinson Work, in the penultimate page the author asks "What Do You Call It?" and illustrates "kid faces" from all over the world;

(e) In the Katz Book, the final page has an illustration of a globe of the planet earth, with children standing all over the planet, with smiling faces, dressed in the clothes of their native culture and land. There is also a dove at one of the picture flying by. In the Lewinson Work, the final page describes an illustration of a globe of the planet earth, with children standing all over the planet, having smiling faces and dressed in their cultures clothes. There is also described a dove at one end; and,

(f) The word "It" in the title of the Lewinson Work, while referring to a "pacifier", is obviously in place of the word 'peace' as indicated by the ultimate finale of the Lewinson Work - "Paci on Earth" (which is cleverly in place of the famous phrase, "Peace on Earth"). It is obvious that title is a derivative of 'What Do You Call Peace'. That is noticeably similar to the title of the Katz Book, "Can You Say Peace"

What makes the above similarities even more striking is the very proof, as stated before, that Katz, from her own words, claimed she got ideas from her publisher, Henry Holt, the same publisher that previous to the Katz Book, entertained and reviewed the Lewinson Work, approximately one year before the idea for the Katz Book. Such direct casual connections have the potential, through discovery, to disclose even more incriminating and infringing evidence. The culmination of the similarities represents more than an array of logical coincidences. In fact, the similarities speak of a common source, the Lewinson Work.

There is a clear factual dispute here, one that satisfies the initial evidentiary burdens, which can only be resolved through the exchange of discovery and proceeding in the instant matter. In this regard, any dispositive motion at this juncture is premature.

In light of the above, it is respectfully requested that this Court: (i) deny permission to the Defendants to file a motion to dismiss the Complaint, or in the alternative for summary judgment.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

Bruce W. Minsky

BWM/jm

cc: Robert D. Balin, Esq., Davis Wright Tremaine, LLP *via Overnight Mail*

EXHIBIT A



Henry Holt and Company

Books for Young Readers

How to Submit Your Manuscript

Henry Holt and Company publishes a wide variety of books for children of all ages including picture books, fiction, and nonfiction. The Books for Young Readers department accepts solicited as well as unsolicited submissions. We do not publish text books, and generally discourage submissions of material written by children. **Please note: due to the number of projects we review each year, we are no longer able to accept simultaneous submissions.**

Please follow these guidelines when preparing your submission:

- Your manuscript should be typed and double-spaced. The department prefers to see complete manuscripts. Authors may submit photocopies.
- Include a brief cover letter with your manuscript that contains your current address and a description of your manuscript. You may want to include other pertinent information such as a list of previously published works.
- All submissions must be accompanied by a **self-addressed, stamped envelope** for the return of your material if we find we cannot use it.
- Do not over-package. A simple manila envelope will protect your manuscript sufficiently.
- **Do not send more than one manuscript at a time.**
- **Do not, under any circumstances, send original art.** Color or black-&-white Xeroxes, prints of original illustrations, or slides should be sent instead. You should not submit illustrations with picture book texts unless you are, yourself, the illustrator.

Although we would like to be able to comment specifically on each manuscript, the large volume of submissions we receive precludes this. We are unable to acknowledge receipt of manuscripts unless a self-addressed, stamped postcard is fastened to the cover letter of the submission.

We will make every effort to take scrupulous care of manuscripts in our possession. We cannot, however, be responsible for their loss or damage.

Submissions can be addressed as follows:

BYR Submissions
Henry Holt and Company
115 West 18th Street
New York, NY 10011

You can expect to receive a reply in 3 - 4 months.

Exhibit C

Zev Lewinson
19 Mariner Way
Monsey, NY 10952
(914) 362-3371
zevnister@aol.com

December 20, 1999

Mr. David Rohlfing;
Editor
Henry Holt & Company Inc.
115 W. 18th Street
New York, NY 10011

Dear Mr Rohlfing:

Thank you for your return call and for taking a few moments to guide me. Please find the enclosed manuscript called *How Mice Became Small*. It is illustrated by a very gifted artist named Debi Coules. I believe her work speaks for itself. Please forgive me for sending an additional story (I have trouble following rules and a need to constantly push the envelope) called *What Do You Call It?* I believe that you will forgive me after you read it.

For a quick autobiography, I would simply say that I'm definitely a "been there, done that by thirty, talmudical scholar kind of guy." Now, at age forty-six, I am a happily married, father of four incredible children (tons of material there). By circumstance I am a diamond dealer. My favorite vocation is Mr. Mom. Needless to say, I love to write.

Enough about me! Let me know how much you (hopefully)love the stories! Thank you so much for your time and consideration of my works. I understand you must read at least a hundred stories a day. Hopefully you'll want to reread these!

Sincerely,

David R.
(212)
(33-0746

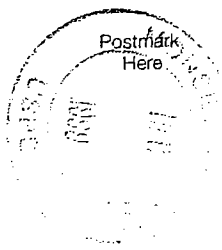
U.S. Postal Service Delivery Confirmation Receipt

Postage and Delivery Confirmation fees must be paid before mailing.

Article Sent To: (to be completed by mailer)

David Rohlfing - Editor
Henry Holt & Company
115 W. 18th Street New York, NY 10011

DELIVERY CONFIRMATION NUMBER:
9902 429E 1000 0462 4NE0



POSTAL CUSTOMER:

Keep this receipt. For inquiries: Access internet web site at www.usps.com or call 1-800-222-1811

delivered
Dec 22 1999

CHECK ONE (POSTAL USE ONLY)

- ☒ Priority Mail
☐ Standard Mail (B)

EXHIBIT B

zev lewinson

Exhibit ✓

From: Zev Lewinson [zev@moremortgage.com]
Sent: Monday, March 26, 2007 4:20 PM
To: 'dovzeev@aol.com'
Subject: FW: how i thought of Peace

This was my next (and last) contact with Mrs. Katz.



MoreMortgage.com
More mortgage. Less hassle.
zev@moremortgage.com

-----Original Message-----

From: karen katz [mailto:kkatzillustrate@earthlink.net]
Sent: Friday, September 01, 2006 3:00 PM
To: Zev Lewinson
Subject: Re: how i thought of Peace

I have to credit the United nations part to my publisher. it was their idea. when you do a book you have to double check all your facts.

k

On Sep 1, 2006, at 1:47 PM, Zev Lewinson wrote:

I'll share that with my little one – and even my four older ones! That was lovely. What made you think of calling the United Nations for each word? That was pretty creative too! And I especially admired the ending where you placed all the children's faces on the same page. Very nicely done.
Most Sincerely,
Zev

-----Original Message-----

From: karen katz [mailto:kkatzillustrate@earthlink.net]
Sent: Friday, September 01, 2006 1:28 PM
To: Zev Lewinson
Subject: how i thought of Peace

Im so thrilled that you like that book. it is my newest.
Here is how i thought of the story:

After 9/11 I was very moved to share my thoughts about Peace with kids. i wondered how could i do a book that would celebrate Peace? How could we all share a book that would help us to be closer and get to know our neighbors around the world? If we could see that we are really all the same inside maybe this could help bring peace. And so i thought...wellwe all can say "Peace", and each of us has a different way to say it, but it always means the same thing. So lets share that. And the book was born.

We are lucky to live in a country where we live in peace and do not have a war going on, but

there are many children around the world who live in contries where they don't feel safe, where there is war. I especially wanted to include those children in this book.

There are so many different and wonderful cultures around the world and so many kinds of kids on our planet. .

My book is a celebration of our differences and our sameness. All children will be our future peacemakers. This book is for them.

all my love
karen katz

Can You Say Peace. Thanks for your quick reply.

-----Original Message-----

From: karen katz [<mailto:kkatzillustrate@earthlink.net>]

Sent: Friday, September 01, 2006 11:44 AM

To: Zev Lewinson

Subject: Re: cute story

Hi Zev,
Thanks for your e-mail.
which story did you read her?
karen

On Sep 1, 2006, at 11:14 AM, Zev Lewinson wrote:

Hi Ms. Katz,

Just read your delightful story to my five year old daughter. She loved your illustrations! She wants to know "how you thought of your story." I told her I was going to email you and that perhaps you would respond. Thanks so much!

Sincerely,
Zev Lewinson
CEO MoreMortgage.Com

MoreMortgage.Com
More mortgage. Less hassle.

EXHIBIT C

What Do You Call It?

by Zev Lewinson

What Do You Call It?

by Zev Lewinson

page 1

Maria, from Mexico, loves her "Chupon." Even her "moon-yeh-ka" (doll) has one!

(illustrate a little girl happily sucking a pacifier while she plays with a doll that is sucking a pacifier)

page 2

Andrea, from Hungary, sucks her "Tzumi" while her Mother brushes her long "hoy" (hair) to get her ready for school.

(illus. the mother combing her hair while she sucks the paci.)

page 3

Sara, from the United States of America, calls her pacifier "Paci" for short. She wouldn't give up her "Paci" for anything in the world!

(illus. Sara sucking the paci and saying. "ahh". or you can have her parent offering her a pile of toys and candy for her paci and she is nodding her head "no" while sucking her paci.)

page 4

In Sweden, Niles sucks his "Naap" while taking his nap. He dreams that he is playing "kurah yomma" (hide and seek) with his friends.

(illus. Niles sleeping and counting sheep-who are sucking pacifiers- and he is playing in his dreams with his friends, while he takes his nap, and smiles while he dreams.)

page 5

Simone', who lives in Germany, enjoys her "Schnuller" while she plays

"fangen shpielen" (tag) with her friends!

(illus. Simone` playing tag as she sucks her pacifier)

page 6

Meanwhile, Irit, who lives in Israel, can't wait to get home from day care to pop "moe-tzaytz" into her mouth. Then she'll play "bu-bah"(dolls) and "kadur" (ball) with her "ha-vay-rim" (friends)!

(show Irit taking a pacifier out of the kitchen drawer)

page 7

Kalala, from the Congo, asks for his "Tayteen" in his country's official language of French. He likes to make believe he is a "simba" (lion), as he roars a cute ferocious roar."

(african dress, perhaps show lions and giraffes in the desert background)

page 8

Meanwhile, down under, in Australia, Andrew loves his "dummy." But don't you dare call him that, because he's a tough little guy! Watch out – or he'll throw his plastic "boomerang" (hunting weapon) at you!

(illus. Andrew in a kubra-brown cowboy hat- while he sucks his paci and get's ready to toss his plastic boomerang.)

page 9

In Ireland, pretty little Caitin is soothed by her "soother" while she plays "glassy alleys" (marbles) and even while she jumps rope.

(illus. the above.)

page 10

Ivan calls his pacifier a "Pustyscka." It's easy for him to pronounce because Russian is his native language. Ivan enjoys his pacifier even while playing in the "snieg" (snow). He finds that it even helps to keep his mouth warm!

(have Ivan dressed like a kossak on a make believe broom horse, as he sucks his paci while he gallops in the snow.)

page 11

Han'ako from Japan, calls her pacifier an "Oshaburi" ! She can pronounce it, while she rides her "san-rin-sha" (tricycle), even with one in her mouth!

(illus. an adorable little girl saying "i love my oshayaburi" while one is in her mouth as she rides her tricycle.)

page 12

During afternoon rest time in nursery school, Mohamed, from Saudi Arabia, sucks his "Masasa" while he dreams about traveling to China. He's exhausted after playing "pur-pur" (one leg hopping race) with his classmates all morning.

(illus. Mohamed with thoughts of china- like the great wall- in his head)

page 13

Meanwhile, in China, Tzu-shuang loves sucking his "Nye-chewey" while sailing on the Yangtze River, as he listens to ancient Chinese "samurai" (warrior) stories from his Grandfather.

(have fun!)

page 14

What Do You Call It?

(illustrate a picture of a crowd of "kids faces" from all over the world. In other words, any of those faces could be "You"!)

page 15

(illustrate a globe of the planet earth, with all the above children standing all over the planet, sucking their pacifiers, with smiling faces, and holding hands, dressed in their cultures clothes. have a banner of ribbon with all their flags encompassing the earth, with a dove at one end.)

"Paci On Earth"

EXHIBIT D

Exhibit C

HENRY HOLT AND COMPANY

Founded 1866

Books for Young Readers

Dear Writer,

We have now had the chance to review your materials and after careful consideration we are sorry to write that we do not feel your project is suitable for our list.

We hope you will excuse this form letter. While we do read all submissions, we receive so many that we are unable to respond to each one individually.

Thank you for taking the time to send your work to Henry Holt Books for Young Readers. We are happy to return your materials herewith if you have provided sufficient postage.

Sincerely,


The Editors

EXHIBIT E



Henry Holt and Company

175 Fifth Avenue
New York, NY 10010
(646) 307-5095

October 11, 2006

Joshua L. Raskin, Esq.
Wolf, Block, Schorr and Solis-Cohen LLP
250 Park Avenue
New York, NY 10177

Re: CAN YOU SAY PEACE? by Karen Katz

Dear Mr. Raskin

I am writing in response to your letter dated September 28, 2006 concerning the above-referenced title, which I received in my office October 4, 2006, as well as to a similar letter of even date that you sent to Karen Katz concerning this same matter. You should direct all future communications regarding your client's claim to my attention.

I have investigated this matter and have determined that your client's claim is without merit for a number of reasons.

First, you seem to have misconstrued the copyright standard for assessing "substantial similarity." Copyright infringement can only be established by a showing of substantial similarity of *protected* expression. I have compared the manuscript attached to your letter as Exhibit 1 to Karen Katz' published book CAN YOU SAY PEACE? and I found no similarities, substantial or otherwise, in the protected expression contained in these two different works. I also note that your letter generally refers to similarities but does not specify the basis for your allegations. The only similarities you could possibly be referring to do not pertain to copyrightable expression, but rather consist of commonly held ideas and stock elements found in numerous children's books dealing with multicultural subjects; these similar ideas or elements are certainly not original to your client's manuscript. Numerous examples of illustrated children's books celebrating the diversity in our world, in terms of racial heritage, ethnicity, culture and language, are to be found in the marketplace. In any event, ideas -- even if we were dealing with original, unique ideas -- are simply not protected by copyright, as the United States copyright law explicitly states: "In no case does copyright protection for an original work of authorship extend to any idea ... concept, principle, or discovery..." 17 U.S.C. Sec. 102.

As your client already knows from his September 1st email exchange with Ms. Katz, the core idea for her book was "We all can say 'Peace,' and each of us has a different way to say it, but it always means the same thing. So let's share that." I do not

know whether your client has shared that email exchange with you. However, the fact is that Mr. Lewinson, in what appears to have been a fishing expedition, and using the guise of a question from his “five year old daughter,” asked Ms. Katz “how you thought of your story,” and was told by Ms. Katz that her book is her own expression of that idea.

Moreover, the evidence is overwhelming that Ms. Katz independently created CAN YOU SAY PEACE? Ms. Katz’ work was originally conceived in the Fall of 2001, in the days following the events of 9/11. She was inspired to write CAN YOU SAY PEACE? after seeing a greeting card which included the word “peace” in many different languages. Other inspirations included a poem written by an eight year old boy entitled *We Ask for Peace*. Ms. Katz also sought to celebrate diversity, as her earlier book THE COLORS OF US had done. Ms. Katz subsequently submitted a proposal for her illustrated book CAN YOU SAY PEACE? to Laura Godwin at Henry Holt and Company. Laura enthusiastically accepted the proposal, and then Kate Farrell worked with Karen Katz for more than three years to develop the illustrations and text for the book. The creative process included research to verify the exact words for peace used in different countries and languages, and careful consideration was given to which countries Ms. Katz wanted to represent in the book.

Finally, your access argument, apparently based on your client’s submission of an unsolicited manuscript to Henry Holt in 1999, is not based upon any probative evidence that Ms. Katz ever had any access to your client’s manuscript. Ms. Katz was not the recipient of your client’s unsolicited submission, nor were either of her editors, Laura Godwin or Kate Farrell. David Rohlfing, the editorial assistant with whom your client communicated back in 1999, is no longer at Henry Holt; in fact he left the company shortly after he communicated with your client back in 1999. According to company policy and practice at the time, unsolicited manuscript material was screened by editorial assistants and, when rejected, was returned to the sender if a self-addressed envelope with sufficient postage was submitted with the material (as indicated in the form rejection letter your client evidently received); if return postage was not included, the unsolicited material was discarded. Moreover, I have confirmed with Ms. Katz that she does not know Mr. Rohlfing and has never had any contact with him concerning any of the works she has authored, including without limitation CAN YOU SAY PEACE? Indeed, until receipt of your letter, none of the individuals involved in the creative process for CAN YOU SAY PEACE? had any knowledge of your client or his manuscript.

Your access argument is also legally flawed, as it appears to be based upon conjecture or speculation. Federal courts have repeatedly rejected the argument that the access requirement for copyright infringement can be met simply by establishing the “bare corporate receipt” of the plaintiff’s work. Dimmie v. Carey, 88 F.Supp.2d 142, 146-49 (S.D.N.Y. 2000) (rejecting claim of infringement by Mariah Carey song where plaintiff alleged sending her tape of a similar song to Columbia Records); Tisi v. Patrick, 97 F.Supp.2d 539, 547-48 (S.D.N.Y. 2000) (rejection of “bare corporate receipt” as proof of access under similar facts); Cox v. Abrams, No. 93 Civ. 6899 (RJW), 1997 WL 251532 (S.D.N.Y. May 14, 1997) (no access found despite Harcourt Publishing Company’s bare corporate receipt of unsolicited manuscript). As these cases make clear, it is access by

the creators of the allegedly infringing work that must be shown. As stated above, there is no evidence whatsoever that Ms. Katz herself ever read or saw your client's manuscript, and neither did either of her editors, Ms. Godwin or Ms. Farrell.

Given the fact that your client was informed by Ms. Katz, more than a month prior to the date of your claim letter, of the independent origins of CAN YOU SAY PEACE? and the core idea upon which her book is based, we find it quite perplexing that Mr. Lewinson would subsequently assert this meritless copyright infringement claim. We respectfully reject Mr. Lewinson's claim of copyright infringement, for the reasons set forth above. We also reserve all of Henry Holt and Company's, and Karen Katz's, rights and remedies in connection with this matter, none of which are waived.

I trust this resolves this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Diana R. Frost", with a stylized flourish at the end.

Diana R. Frost
Associate General Counsel

cc: Karen Katz
Kate Farrell
Laura Godwin